

EXHIBIT
A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

C. M. COLLINS, N. J. LUNDY and R. C. L. MAYS, individually and on behalf of all others similarly situated,

Plaintiffs,

VS.

**CATASTROPHE RESPONSE UNIT,
INC. and CATASTROPHE RESPONSE
UNIT USA, INC.,**

Defendants.

CIVIL ACTION NO. 4:22-cv-1073

DECLARATION OF MONTE K. HURST

I, Monte K. Hurst, declare that the following statements are true and correct, and based on my personal knowledge.

1. My name is Monte K. Hurst. I am over 18 years of age, of sound mind, and have never been convicted of a felony. I am personally acquainted with the facts stated herein. I affirm that the following is true and correct.
2. I am a Shareholder, Director and the Head of Litigation at the law firm of HALLETT & PERRIN, P.C. in Dallas, Texas. I am lead counsel for Defendants Catastrophe Response Unit USA, Inc. and Catastrophe Response Unit, Inc. in this matter.
3. Through good-faith discussions between counsel after the telephone conference, the parties agreed to the following:
 1. Plaintiffs will, by December 8, 2023, remove their objections to the Defendants' requests for production seeking tax information specifically as to the eight identified Plaintiffs' W-2s, 1099s, and T4A-NR for Tax Years 2019, 2020, 2021, and 2022, and respond in accordance with the Federal Rules of Civil Procedure.

2. Plaintiffs will, by December 8, 2023, produce for each Facebook account Carla Collins manages, all of the items under each of the following subfolders under Ms. Collins' Facebook Activity Log, for days when she claimed to have been working for CRU, in HTML format:

- Your Posts;
- Messages;
- Comments and reactions;
- Stories;
- Groups;
- Pages;
- Events; and
- Other activity.

Attached hereto as Exhibit A.1 is a true and correct copy of an e-mail message exchange between Kerry O'Brien and me on December 4, 2023.

4. On December 8, 2023, Plaintiffs Carla Collins, Rasheedah Mays and Pamela James did not produce tax documents. Plaintiffs' counsel communicated that Ms. James is currently in Canada and does not return to the U.S. until December 13, 2023, and committed that they would produce her tax documents sometime upon her return. Attached hereto as Exhibit A.2 is a true and correct copy of Kerry O'Brien's e-mail message to me of December 8, 2023.
5. On December 8, 2023, Plaintiffs' counsel communicated that Ms. Collins was not able to comply with her obligations to produce her Facebook data because her family suffered a family tragedy in the middle of last week. Attached hereto as Exhibit A.2 is a true and correct copy of Kerry O'Brien's e-mail message to me of December 8, 2023.
6. Ms. Collins has made 35 posts on Facebook since the date on which she supposedly suffered a family tragedy. In the last 24 hours alone, Ms. Collins has made 17 posts on her public Facebook page. The topics of these posts range from a wedding to a movie that she was watching at the time she was posting. Attached hereto as Exhibit A.3 are true, correct and authentic screenshots taken by me of Carla Collins' Facebook posts between December 6, 2023, and December 13, 2023.

(This space is intentionally left blank)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED in Dallas County, State of Texas, on this 13th day of December 2023.

Monte K. Hurst

MONTE K. HURST